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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN JOSE DIVISION

12 UNITED STATES OF AMERICA,)	NO. 24-MJ-71019 MAG
13 Plaintiff,)	STIPULATION TO EXCLUDE TIME; AND
14 v.)	[PROPOSED] ORDER
15 URIEL CASTANEDA GALLEGOS,)	
16 Defendant.)	

17
18 Currently, a preliminary hearing is scheduled for September 11, 2025. The parties are
19 requesting that this hearing be continued to October 28, 2025. The parties stipulate that time should be
20 excluded under the Speedy Trial Act from September 11, 2025, through October 28, 2025.

21 The Government has produced discovery to Defendant. The defense has reviewed the discovery.
22 The parties are close to resolving this matter. The defense requires additional time to look over a few
23 more matters. Accordingly, the parties stipulate and agree that excluding time until October 28, 2025,
24 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties
25 further stipulate and agree that the ends of justice served by excluding the time from September 11,
26 2025, through October 28, 2025, from computation under the Speedy Trial Act outweigh the best
27 interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

28 The parties further stipulate and agree that, given the need to investigate matters which may bear
STIPULATION TO EXCLUDE TIME AND [PROPOSED] ORDER

v. 7/10/2018

1 on the disposition in the case, good cause exists for extending the time limits for a preliminary hearing
2 under Federal Rule of Criminal Procedure 5.1(d), and defense counsel accordingly consents on behalf of
3 the defendant to extending the time limit for the preliminary hearing. The parties further stipulate and
4 agree to an extension of time for the 30-day time period of an indictment under the Speedy Trial Act.

5 IT IS SO STIPULATED.

6
7 DATED: September 9, 2025

8 /s/
NEAL C. HONG
Assistant United States Attorney

9 /s/
10 SOPHIA WHITING
Counsel for Defendant

[~~PROPOSED~~] ORDER

Based upon the facts set forth in the stipulation of the parties, the Court continues the preliminary hearing scheduled for September 11, 2025, to October 28, 2025, and excludes time under the Speedy Trial Act. The Court finds that failing to exclude the time from September 11, 2025, through October 28, 2025, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv).

The Court further finds that the ends of justice served by excluding the time from September 11, 2025, through October 28, 2025, from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial.

Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from September 11, 2025, through October 28, 2025, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

The Court further finds good cause exists for extending the time limits for a preliminary hearing under Federal Rule of Criminal Procedure 5.1 and for extending the 30-day time period for an indictment under the Speedy Trial Act. *See* Fed. R. Crim. P. 5.1; 18 U.S.C. § 3161(b).

IT IS SO ORDERED.

DATED: September 10, 2025


HON. SUSAN VAN KEULEN
United States Magistrate Judge